

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street San Francisco, CA 94105-3901

July 6, 2004

Raymond E. May, President PTP, Incorporated P.O. Box 188 Minden, NV 89423

Re: Pineview Subdivision (formerly referred to as Pine View Estates) Underground

Injection Control Permit

Dear Mr. May:

This letter is to inform you the United States Environmental Protection Agency, Region 9 (EPA) has completed the technical review of your federal Underground Injection Control (UIC) permit application for Pineview Subdivisions' wastewater treatment systems. The technical review evaluates the information you provided for your permit application. Additional information, and clarification of previously submitted information, may still be requested if deemed necessary by the EPA.

Based on our review, the following items must be addressed:

1. <u>Modifications to the Disposal Field A injection well design are required.</u>

The UIC permit will contain injectate concentration limits for nitrate, biological oxygen demand, and total suspended solids of 15 milligrams per liter (mgL⁻¹), 25 mgL⁻¹, and 25 mgL⁻¹, respectively. The injectate produced by the current wastewater treatment design on the Disposal Field A injection line will not be able to meet these permit conditions. However, the technical review has determined the proposed advanced wastewater treatment units (according to their manufacturer), utilized as part of the design submitted for Disposal Field B, have the ability to meet the permit's injectate concentration restrictions provided the treatment units are properly operated and maintained. EPA requires that you modify the Disposal Field A injection well design in order to meet the concentration limitations for nitrate, biological oxygen demand, and total suspended solids that will be established by the pending permit. EPA must receive these modifications before the draft permit can be completed and submitted for public comment.

2. Four (4) Monitoring Wells must be installed for each injection well.

Disposal Fields A and B will each be required to have four (4) monitoring wells to accurately detect any potential degradation of ground water quality resulting from the

injection activities at Pineview Subdivision. The hydrogeologic gradient presented with the application materials is inconclusive due to the presence of a fault beneath the Pineview Subdivision. The precise location and approximate design (anticipated depth, construction material, etc.) for each monitoring well must be presented to EPA and approved prior to construction. The requirement to design and install four (4) monitoring wells for each injection well will be a permit condition, but does not have to be completed before the draft permit is submitted for public comment.

Please call Eric Byous at (415) 972-3531 if you have any questions regarding this letter.

Sincerely,

David Albright

Manager, Ground Water Office